



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

JOSEPH M. HIRAOKA, JR.  
Senior Counsel

[jhiraoka@law.nyc.gov](mailto:jhiraoka@law.nyc.gov)  
Phone: (212) 356-2413  
Fax: (212) 356-1148

March 3, 2023

Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,  
No. 20 Civ. 8924 (CM) (GWG)  
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter.

Pursuant to the Court's Order dated January 31, 2023 (Docket No. 836), Defendants were to produce closed APU and DAO files by March 3, 2023 along with a privilege log. Defendants write to advise the Court that all closed APU and DAO files have been provided except for one APU file. The parties have agreed to extend the time to produce the one closed APU file and privilege log to March 8, 2023.

Thank you for your consideration herein.

Respectfully submitted,

Joseph M. Hiraoka, Jr. s/

Joseph M. Hiraoka, Jr.  
Senior Counsel  
Special Federal Litigation Division

cc: ALL COUNSEL (via e-mail)